

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 16-2738 (MAS) (RLS) JUDGE MICHAEL A. SHIPP MAG. JUDGE RUKHSANAH L. SINGH
THIS DOCUMENT RELATES TO: JOSEPH JOHN KELEHER, individually and on behalf of the Estate of Cheryl Diane Keleher; and Jordan Lane Miller Plaintiff(s), v. JOHNSON & JOHNSON and JOHNSON & JOHNSON CONSUMER INC. Defendants.	Civil Action No. 3:18-cv-02561 RESPONSE TO AUGUST 15, 2024 ORDER TO SHOW CAUSE (DKT. 33096)

Sara Beth Craig of Peiffer Wolf Carr Kane Conway & Wise, LLP, counsel of record for Plaintiff Joseph John Keleher, individually and on behalf of the Estate of Cheryl Diane Keleher, submits the following Response to the Court’s August 15, 2024 Order to Show Cause Why Cases on the Attached Exhibit A Should Not Be Dismissed With Prejudice (Dkt. 33096).

On March 6, 2018, a Short Form Complaint was directly filed on behalf of Plaintiff Joseph John Keleher, individually and on behalf of the Estate of Cheryl Diane Keleher, et al. in MDL No. 2738. Pursuant to the September 1, 2023 Amended Plaintiff’s Profile Form (“PPF”) Order, a Plaintiff Profile Form, core records, and signed medical records authorization were required to be served upon Defendants via MDL Centrality by a certain date. During the pendency of the bankruptcy, counsel for Plaintiff moved firms, and transfer of Plaintiff’s file from counsel’s prior firm was delayed, including transfer of the records in MDL Centrality. However, upon receipt of the case file and transfer of the MDL Centrality records, counsel for Plaintiff completed and served

the Plaintiff Profile Form on April 15, 2024, prior to the filing of Defendants' Motion to Dismiss.
As such, Plaintiff respectfully requests that the Court not dismiss the case with prejudice.

Dated: April 16, 2025

Respectfully submitted,

/s/ Sara Beth Craig

Sara Beth Craig

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed through the Court's CM/ECF system on April 16, 2025, which shall send notification of such filing to all CM/ECF participants.

/s/ Sara Beth Craig
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